

KING COUNTY SUPERIOR COURT FOR THE STATE OF WASHINGTON

Plaintiffs,

No.

vs.

AGREED JURY INSTRUCTIONS

(ILLUSTRATIVE)

Defendant.

The parties submit the agreed jury instructions provided herewith.

<i>Pl. No.</i>	<i>Def. No.</i>	<i>Authority</i>	<i>Title</i>
2	-	WPI 6.01	Before Administering Oath on Voir Dire
3	-	WPI 1.01	Advance Oral Instruction (After Voir Dire)
5	3	WPI 20.05	Summary of Claims
6	-	WPI 6.02	Before Recesses
7	-	WPI 6.09	Use of Depositions
8	-	WPI 6.06	Exhibit Admitted for Illustrative Purposes
9	1	WPI 1.02	Conclusion of Trial—Introductory Instruction
10	4	WPI 1.03	Direct and Circumstantial Evidence
12	-	WPI 2.13	Insurance
13	7	WPI 2.10	Expert Testimony
14	5	WPI 1.07	Corporations and Similar Parties
15	6	WPI 50.18	Corporation Acts Through its Employees—No Issue as to Scope of Agency
16	8	WPI 21.01	Meaning of Burden of Proof—Preponderance of the Evidence
18	10	WPI 10.01	Negligence – Adult – Definition
19	11	WPI 10.02	Ordinary Care – Adult – Definition
20	-	WP. 12.06	Duty of Seeing
21	13	WPI 12.07	Right to Assume Others Will Exercise Ordinary

			Care
22	-	WPI 120.05	Business or Public Invitee - Definition
26	12	WPI 11.01	Contributory Negligence—Definition
27	-	WPI 11.07	Determining the Degree of Contributory Negligence
34	-	WPI 14.04	Fault to be Apportioned
35	20	WPI 1.11	Concluding Instruction—For Special Verdict Form
37	-	WPI 6.20	Completion of Trial – Jurors’ Discussion of Case

DATED this 9th day of November, 2012.

Attorneys for Plaintiffs

By: _____

DATED this 9th day of November, 2012.

Attorneys for Defendant

By: _____

DATED this 9th day of November, 2012.

Attorneys for Defendant

By: _____